1 JAN DAVID KAROWSKY 2 Attorney at Law A Professional Corporation California State Bar Number 53854 3 716 19<sup>th</sup> Street, Suite 100 4 Sacramento, CA 95811-1767 KarowskyLaw@sbcglobal.net (916) 447-1134 (916) 448-0265 (Fax) 6 Attorney for Defendant 7 Christopher King 8 UNITED STATES DISTRICT COURT 9 IN AND FOR THE EASTERN DISTRICT OF CALIFORNIA 10 11 United States of America, Case No. 2:24-cr-00120-DC 12 Plaintiff, 13 STIPULATION TO CONTINUE STATUS VS. CONFERENCE AND [PROPOSED] 14 **ORDER** Christopher King, 15 **Date: August 29, 2025** Defendant Time: 9:30 a.m. 16 **Court: Hon. Dena Coggins** 17 18 19 20 IT IS HEREBY STIPULATED, by and between the parties, through their respective 21 counsel, Assistant United States Attorney Heiko Coppola, counsel for plaintiff, and Jan David 22 Karowsky, counsel for defendant Christopher King, that the status conference scheduled for 23 August 29, 2025 at 9:30 a.m., be continued to October 17, 2025 at 9:30 a.m. 24 Since the last scheduled status conference, the defense has hired a local forensic 25 psychiatrist to examine Mr. King and review his social history and other relevant records in order

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to prepare a report to further document and analyze the trauma and the psychological effects of the severe childhood trauma inflicted upon Mr. King and provide a written report. Based on the psychiatrist's schedule, it took a bit longer than originally anticipated for him to meet with and examine Mr. King. That meeting occurred on August 1, 2025. The psychiatrist indicated he needed approximately one month to complete a report. Additionally, once the defense receives the report, I may need to do additional investigation and provide the report to the prosecutor and engage in further discussions relative to resolving the case.

Counsel for defendant believes that failure to grant the above-requested continuance would deny the defendant the reasonable time necessary for effective preparation and representation, taking into account the exercise of due diligence.

The government does not object to the continuance.

The continuance is not based on the congestion of the Court.

Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of August 29, 2025 to October 17, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C.§ 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendants in a speedy trial.

Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

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1	Accordingly, the parties request that the status conference in this matter be reset to	
2	October 17, 2025 at 9:30 a.m. The parties agree that the ends of justice served by resetting the	
3	status conference date outweigh the best interest of the public and the defendant in a speedy trial.	
4	Dated: August 14, 2025	Respectfully submitted,
5		ERIC GRANT
6		United States Attorney
7		/s/ HEIKO COPPOLA
8		by HEIKO COPPOLA
9		Assistant United States Attorney
10	DATED: August 14, 2025	JAN DAVID KAROWSKY
11		Attorney at Law A Professional Corporation
12		/s/ Jan David Karowsky
13		by
14		JAN DAVID KAROWSKY Attorney for Defendant
15		Christopher King
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<u>ORDER</u>

The court, having received, read and considered the parties' stipulation and good cause appearing therefrom, ADOPTS the parties' stipulation. Accordingly, the Status Conference scheduled for August 29, 2025, at 9:30 a.m. is VACATED and RESET for October 17, 2025 at 9:30 a.m. in Courtroom 8 before the Honorable Dena M. Coggins. The time period between August 29, 2025 and October 17, 2025 inclusive, is excluded under the Speedy Trial Act pursuant to 18 U.S.C.§ 3161(h)(7)(A), B(iv) [Local Code T4], as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendants in a speedy trial.

IT IS SO ORDERED.

Dated: **August 14, 2025** 

Dena Coggins

United States District Judge